

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

BAYER US LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 8:22-cv-00082
	)	
ALTEN, LLC; MEAD CATTLE	)	
COMPANY, LLC; GREEN DISPOSAL	)	
MEAD, LLC; PLATTE RIVER GREEN	)	<b>JOINT STATUS REPORT</b>
FUELS, LLC; and TANNER SHAW, in his	)	
Individual and official capacities,	)	
	)	
Defendants.	)	

---

PIONEER HI-BRED INTERNATIONAL,	)	
INC.; CORTEVA AGRISCIENCE, LLC;	)	
AGRELIANT GENETICS, LLC; BECK'S	)	
SUPERIOR HYBRIDS, INC.; and	)	
WINFIELD SOLUTIONS, LLC,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 8:22-cv-00070
	)	
ALTEN, LLC; MEAD CATTLE	)	
COMPANY, LLC; GREEN DISPOSAL	)	
MEAD, LLC; PLATTE RIVER GREEN	)	
FUELS, LLC; and TANNER SHAW, in his	)	
Individual and official capacities,	)	
	)	
Defendants.	)	

---

SYNGENTA SEEDS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 8:22-cv-00071
	)	
ALTEN, LLC; MEAD CATTLE	)	
COMPANY, LLC; GREEN DISPOSAL	)	
MEAD, LLC; PLATTE RIVER GREEN	)	

FUELS, LLC; TANNER SHAW and )  
SCOTT TINGELHOFF, )  
 )  
Defendants. )

**JOINT STATUS REPORT**

COMES NOW Plaintiffs Pioneer Hi-Bred International, Inc.; Corteva Agriscience, LLC; AgReliant Genetics, LLC; Beck's Superior Hybrids, Inc.; Winfield Solutions, LLC; Syngenta Seeds, LLC; and Bayer US LLC ("Plaintiffs"), and Defendants AltEn, LLC; Mead Cattle Company, LLC; Green Disposal Mead, LLC; Platte River Green Fuels, LLC; Earth, Energy, & Environment, LLC; AltEn Operating Co. LLC; E3 Biofuels, LLC; Integrated Recycling, LLC; Falcon Energy, LLC; Mead Acquisition Company, LLC; and Tanner Shaw and Scott Tingelhoff ("Defendants"), and hereby submit a Joint Status Report to the Court as required by the Court's Third Amended Case Progression Order, issued April 24, 2024 ("Third Progression Order") (Filing No.144):

1. At the April 24, 2024 Status Conference, the Plaintiffs and Defendants informed the Court that the Plaintiffs (known as the AltEn Facility Response Group ("FRG")), the Defendants, and the State of Nebraska ("State") had begun engaging in settlement discussions related to a global resolution of this lawsuit and other lawsuits concerning the AltEn Property ("Site"). As the Court is aware, the other lawsuits concerning the Site include Saunders County District Court Case No. CI 22-167 and Saunders County District Court Case No. CI 21-36.

2. Since the entry of the Third Progression Order, the FRG, the Defendants, and the State have continued their efforts to resolve this and the other lawsuits.

3. On May 10, 2024, the FRG, the Defendants, and the State attended their second formal settlement meeting related to the global resolution of this and the other lawsuits.

4. While a settlement agreement has not yet been reached, the FRG, the Defendants, and the State have communicated their alignment with a common settlement framework.

5. Further, at the conclusion of the May 10 meeting, the State, FRG, and Defendants agreed to continue engaging in efforts reach a resolution, scheduling additional formal settlement discussions to occur in June, July, and August 2024.

6. The Parties continue to engage with the State and actively participate in efforts to resolve this and other disputes, and the FRG continues with its efforts under the Voluntary Cleanup Program.

Dated: May 21, 2024

Respectfully submitted,

By: /s/ Katherine A. McNamara  
Stephen M. Bruckner, #17073  
Katherine A. McNamara, #25142  
FRASER STRYKER PC LLO  
550 Energy Plaza  
409 South 17<sup>th</sup> Street  
Omaha, Nebraska 68102-2663  
(402) 341-6000  
sbruckner@fraserstryker.com  
kmcnamara@fraserstryker.com  
**CO-COUNSEL FOR  
PLAINTIFF SYNGENTA SEEDS,  
LLC**

By: /s/ Elizabeth M. Lally  
Elizabeth M. Lally, #26428  
SPENCER FANE LLP  
13520 California Street, Suite 290  
Omaha, Nebraska 68154  
(402) 965-8600 (telephone)  
(402) 965-8601 (facsimile)  
elally@spencerfane.com  
**CO-COUNSEL FOR PLAINTIFF  
BAYER US LLC**

By: /s/ Todd W. Weidemann  
Todd W. Weidemann, #20505  
WOODS AITKEN LLP  
10250 Regency Circle, Suite 525  
Omaha, Nebraska 68114  
(402) 898-749 (telephone)  
(402) 898-7401 (facsimile)  
tweidmann@woodsaitken.com

By: /s/ Joseph A. Wilkins  
Joseph Wilkins, #21803  
MASON RICKETTS LAW FIRM  
1347 s. 13<sup>th</sup> St., Ste. 1200  
Lincoln, NE 68508  
(402) 475-8433  
jaw@mattsonricketts.com  
**ATTORNEY FOR  
DEFENDANTS ALTEN, LLC;  
MEAD CATTLE COMPANY,  
LLC; GREEN DISPOSAL  
MEAD, LLC; PLATTE RIVER  
GREEN  
FUELS, LLC; TANNER  
SHAW and SCOTT  
TINGELHOFF.**

Abigail R. Frame, Colo. No. 52901  
WOODS AITKEN LLP  
7900 E. Union Avenue, Suite 700  
Denver, Colorado 80237  
(303) 606-6700 (telephone)  
(303) 606-6701 (facsimile)  
aframe@woodsaitken.com  
**LOCAL COUNSEL FOR  
PIONEER HI-BRED  
INTERNATIONAL, INC.;  
CORTEVA AGRISCIENCE, LLC;  
AGRELIANT GENETICS, LLC;  
BECK'S SUPERIOR HYBRIDS,  
INC; AND WINFIELD  
SOLUTIONS, LLC**

Kirsten L. Nathanson,  
DC No. 463992  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue NW  
Washington., D.C. 20004  
Tel: (202) 624-2887  
Fax: (202) 628-5116  
Email: knathanson@crowell.com  
**ATTORNEY FOR PLAINTIFF  
PIONEER HI-BRED  
INTERNATIONAL, INC. AND  
CORTEVA AGRISCIENCE, LLC**

J Jackson, MN Bar No. 49219  
B. Andrew Brown, MN Bar No. 0205357  
DORSEY & WHITNEY LLP  
50 South Sixth Street, Suite 1500  
Minneapolis, MN 55402  
Telephone: (612) 340-2600  
Email: jackson.j@dorsey.com  
Email: brown.andrew@dorsey.com  
**ATTORNEYS FOR PLAINTIFF  
WINFIELD SOLTUIONS, LLC**

Anthony C. Sallah (MI Bar No. P84136)  
BARNES & THORNBURG, LLP  
171 Monroe Ave., NW, Suite 1000  
Grand Rapids, Michigan 49503  
Telephone: (616) 742-3930  
Email: asallah@btlaw.com  
**ATTORNEYS FOR PLAINTIFF**  
**AGRELIANT GENETICS, LLC**

Amy Berg, Ind. No. 32513-32  
Robert A. Jorczak, Ind. No. 32027-29  
ICE MILLER LLP  
One American Square, Suite 2900  
Indianapolis, IN 46282-0200  
Telephone: (317) 236-2100  
Fax: (317) 592-4790  
Email: amy.berg@icemiller.com  
Email: louie.jorczak@icemiller.com  
**ATTORNEYS FOR PLAINTIFF**  
**BECK'S SUPERIOR HYBRIDS, INC.**